

AMIR JABERZADEH
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Email: amirhossein.jaberzadeh@gmail.com
Defendant/Counterclaimant

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

AMERICAN HEART TECHNOLOGIES,
LLC, a Delaware limited liability
company; HEARTLUNG
CORPORATION, a Delaware
Corporation.,

Plaintiffs,

v.

AMIRHOSSEIN JABERZADEH
ANSARI aka AMIR JABERZADEH, an
Individual; and DOES 1 – 10,

Defendants.

RELATED COUNTER-ACTION

Case No. 2:22-cv-08387-MEMF-RAO

Complaint Filed: November 16, 2022

Trial Date: June 2, 2025

**NOTICE OF MOTION AND
MOTION FOR SUMMARY
JUDGMENT PURSUANT TO FED.
R. CIV. P. 56**

DATE: February 6, 2025

TIME: 10:00AM

JUDGE: HONORABLE

MAAME EWUSI-FRIMPONG
COURTROOM: 8B

TO THE HONORABLE COURT AND TO ALL PARTIES:

PLEASE TAKE NOTICE that on February 6, 2024 at 10:00 AM, or as soon thereafter as this matter may be heard in the above-entitled Court located at United States Courthouse, 350 West First Street, Los Angeles, CA, 90012, Courtroom 8B, 8th Floor, Amirhossein Jaberzadeh Ansari (aka Amir Jaberzadeh), the Defendant in this case will move this Court for summary judgment, pursuant to Federal Rule of Civil Procedure 56. This motion is based on this notice, the memorandum of points and authorities filed herein, the declaration(s) filed Defendant, the exhibits filed herein, the statement of uncontroverted facts and conclusions of law, the pleadings

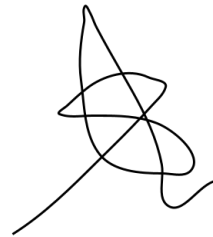
NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT

1
2 previously filed in this action, and any oral argument permitted at the hearing on this
3 motion.

4 This motion is made following the conference of counsel pursuant to Local
5 Rule 7-3 which took place on August 29, 2024.

6
7
8 DATED: December 25, 2024

Defendant Jaberzadeh



By:

Defendant Jaberzadeh, Defendant/Counter

9
10 Claimant

PROOF OF SERVICE

American Heart Technologies LLC, et al. v. Amirhoussein Jaberzadeh, et al.

Case No. 2:22-cv-08387

On December 25, 2024, I served the foregoing documents described as on the interested parties in this matter:

NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT

DEFENDANTS' MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

DECLARATION OF DEFENDANT JABERZADEH IN SUPPORT OF DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT

(PROPOSED) JUDGMENT GRANTING MOTION FOR SUMMARY JUDGMENT

EXHIBITS IN SUPPORT OF MOTION FOR SUMMARY JUDGEMENT

STATEMENT OF UNCONTROVERTED FACTS AND CONCLUSIONS OF LAW IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

() BY FIRST CLASS MAIL: By placing copies thereof enclosed in sealed envelopes addressed to the interested parties and depositing such envelope(s) in the mail at San Pedro, California. The envelopes were mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with U.S. Postal Service on the same day in the ordinary course of business. I am aware on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

(XX) EMAIL/ELECTRONIC TRANSMISSION: Based on an agreement of the parties to accept service by email or electronic transmission, I caused the documents to be sent to the person at the email addresses listed in the SERVICE LIST. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

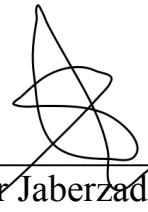
() BY CM/ECF: With the Clerk of the United States District Court of California using the CM/ECF System. The Court's CM/ECF System will send an e-mail

NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT

notification of the foregoing filing to the parties and counsel of record who are registered with the Court's CM/ECF System.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

EXECUTED on December 25, 2024, in San Pedro, California.



Amir Jaberzadeh

SERVICE LIST

Naveen Madala, Esq.
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Irvine, California 92602
naveen@madalalaw.com

**Counsel for Plaintiffs,
AMERICAN HEART TECHNOLOGIES,
LLC and HEARTLUNG COPORATION**